

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

SCOTT T. BALLOCK

Case No.: 1:17-CV-52

Plaintiff,

v.

JURY TRIAL REQUESTED

**ELLEN RUTH COSTLOW,
STATE TROOPER MICHAEL KIEF,
STATE TROOPER RONNIE M. GASKINS,
and
STATE TROOPER CHRIS BERRY,**

Defendants.

**PLAINTIFF'S OPPOSITION TO TROOPER DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

Ellen Ruth Costlow deposition except, p. 188, cited at page 17.

Exhibit No. 9

1 A. When Monongalia County Sheriff Department
2 called me, they were concerned about my safety because
3 Tom was coming in asking for record, asking ---.

4 Q. Yeah, you already said that.

5 A. And so, and Freedom of Information Act was the
6 reason why. Then when I was called in for the state
7 troopers I didn't know why. I had no idea why when I
8 walked in there. So when I sat down the question was do
9 you know Thomas Ballock. So this was the second time in
10 a week being concerned about Thomas Ballock. And at that
11 point I --- yeah, me too. But there was a lot of strange
12 stuff going on during this time. And this whole --- I
13 didn't know that he called and said --- alleged that I
14 was having an affair with Chris Berry.

15 Q. You didn't know until I started asking you
16 about it?

17 A. Right.

18 Q. Sergeant Kief never asked you straight out have
19 you had a romantic relationship ---

20 A. No.

21 Q. --- with Chris Berry?

22 A. No. But probably because what I told them was
23 there are emails, there's anonymous stuff I think that
24 are coming from him, I'm going through a horrible